

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOSEPH SANT, MERTON CHUN,
RONESHA SMITH, and HEATHER
NICASTRO, individually and on behalf of all
others similarly situated

Plaintiffs,

vs.

ROCKETREACH LLC,

Defendant.

Case No. 2:24-cv-1626-RSM

STIPULATED MOTION TO EXTEND
RESPONSE AND REPLY DEADLINES
PERTAINING TO DEFENDANT'S
MOTION TO DISMISS, MOTION TO
STRIKE, AND MOTION TO COMPEL
ARBITRATION

STIPULATION

WHEREAS, Plaintiffs Joseph Sant, Merton Chun, Ronesha Smith, and Heather Nicastro (collectively, "Plaintiffs") filed Case No. 2:24-cv-1626 against RocketReach LLC ("Defendant") on October 8, 2024;

WHEREAS, Defendant was served with Plaintiffs' Complaint on October 23, 2024;

WHEREAS, Defendant on December 27, 2024 filed a Motion to Dismiss (ECF No. 18), a Motion to Strike Class Allegations (ECF No. 19), and a Motion to Compel Arbitration and Stay Proceedings (ECF No. 16) (taken together, the "Motions");

WHEREAS, Plaintiffs' current deadline to respond to the Motions is February 11, 2025;

WHEREAS, Plaintiffs' counsel has numerous interceding briefing deadlines and arguments in other matters before February 11, 2025;

WHEREAS, Defendant's current deadline to reply to Plaintiffs' anticipated responses is February 18, 2025;

1 WHEREAS, Defendant's counsel has numerous interceding briefing deadlines in other
2 matters before February 18, 2025;

3 THEREFORE, Plaintiffs and Defendant hereby STIPULATE AND AGREE to extend the
4 deadline for Plaintiffs to respond to the Motions to March 13, 2025 and the deadline for Defendant
5 to reply to Plaintiffs' anticipated responses to April 14, 2025. This stipulation shall not operate
6 as an admission of any factual allegation or legal conclusion, nor shall it operate as a waiver or
7 otherwise affect any right, defense, claim or objection by any party.

8 Stipulated to this 21st day of January, 2025.

9 Presented and stipulated to by:

10 NICK MAJOR LAW

11
12 By: /s/ Nick Major
13 Nick Major, WSBA #49579
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17 *Attorneys for Plaintiffs*

18 HEDIN LLP

19 By: /s/ Tyler K. Somes
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24 *Attorneys for Plaintiffs*

25 Stipulated to by:

26 WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

27 By: /s/ Patrick G. Lynch
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ORDER

IT IS SO ORDERED.

DATED this ____ day of January, 2025

HON. RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE